

EXHIBIT B

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Attorneys for Defendant
Jason Edward Thomas Cardiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 5:23-CR-00021-JGB

vs.
**JASON EDWARD THOMAS
CARDIFF**

| And

LILIA MURPHY and BRIAN
KENNEDY

Sureties

**DECLARATION OF BRIAN KENNEDY IN SUPPORT OF RESPONSE TO
GOVERNMENT'S MOTION FOR ORDER FORFEITING BAIL AND FOR SUMMARY
ADJUDICATION OF OBLIGATION**

I, Brian Kennedy, declare as follows:

1. I have personal knowledge of the facts set forth herein. If called as a

1 witness, I could and would competently testify to the matters stated
2 herein. I make this declaration to address the Government's Motion
3 for Order Forfeiting Bail and for Summary Adjudication.

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5 2. I have signed a waiver of conflict of interest to allow my Mr. Cochell to
6 represent me in the Government's request to forfeit bond and to also
7 represent Lilia Murphy Cochell and Mr. Cardiff.

8 3. I became a member of the Board of Directors in Redwood Scientific
9 Technologies, Inc. in 2023.

10 4. I am one of the bondholders who signed an affidavit of surety and
11 pledged \$30,000 as security if Jason Cardiff did not comply with his
12 bond conditions.

13 5. I have spent a good deal of time with Jason Cardiff over the years
14 During that time, I became aware that he had some medical issues but not
15 in any detail.

16 6. In or about September, 2024 I became aware that Jason was given
17 permission by the Court to travel to Ireland after his wife suffered a heart
18 attack. I understand that he later was granted permission to return to
19 Ireland to visit his wife and child and see a pulmonologist. I was
20 informed that Jason's health problems were serious and that his General
21 Practitioner certified that he was medically unfit to fly home to the
22 United States.

23 7. Sometime in January, 2025, Jason advised me that he had applied to the
24 Court for an extension of time to complete treatment in Ireland and that
25 the Court denied his motion and ordered him to return to the United
26 States. During a discussion with Jason about his health, I told Jason that
27 I thought that he should return to the United States. In substance, he told
28

1 me that he wanted to return to the United States but did not want to risk
2 that he would suffer additional and lasting harm by returning before
3 completing prescribed treatment.

4 8. I understand that there are some pretrial motions to dismiss the case that
5 may affect the bond issues before the Court. I would request that these
6 legal issues be resolved before determining the Government's motion to
7 forfeit bond.

8 9. This is a summary of events. I reserve the right to supplement my
9 testimony if called as a witness at hearing or trial.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct.

12 Executed on this 10th day of February 2025, at Upland, California.

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14 Brian Kennedy
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